

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

JAN 22 2020

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

§ § § § § § § § § §

VS.

**DEMETRIUS DELAAN WHITE
aka D and DEONTE DANQUISE
BAILEY-ROACH aka SHEIN**

Case No. 4:19-CR-228-S

Defendants.

SUPERSEDED INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE
Sex Trafficking of a Minor

Beginning on or about November 6, 2017, and continuing until on or about November 10, 2017, in the Southern District of Texas and elsewhere, defendants

DEMETRIUS DELAAN WHITE aka D and
DEONTE DANQUISE BAILEY-ROACH aka SHEIN,

in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited, or attempted to do so, by any means a person, namely a minor female known as MV1, who had attained the age of 14, but was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing and soliciting by any means MV1, and that MV1, whom defendant had a reasonable

opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex act,

in violation of 18 U.S.C. §§ 1591(a), (b), (c) and 2.

NOTICE OF FORFEITURE
(18 U.S.C. § 1594(d))

Pursuant to 18 U.S.C. § 1594(d), the United States gives notice to defendants,

**DEMETRIUS DELAAN WHITE aka D and
DEONTE DANQUISE BAILEY-ROACH aka SHEIN,**

that upon their conviction of Count 1, the United States intends to seek forfeiture of:

- (1) all property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and
- (2) all property, real or personal, that constitutes or is derived from any proceeds obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

The property subject to forfeiture includes, but is not limited to, the following:

A black Samsung Galaxy S8 cellular phone, IMEI 355987081390733

A black Apple iPhone, IMEI 359402083718507

MONEY JUDGMENT AND SUBSTITUTE ASSETS

The United States intends to seek the imposition of a money judgment against each defendant. The Defendants are notified that in the event that one or more conditions listed

in 21 U.S.C. § 853(p) exists, the United States will seek to forfeit any other property of each Defendant up to the amount of the money judgment against that defendant.

RYAN K. PATRICK
United States Attorney

By: Kate Suh
Eun Kate Suh
Sebastian A. Edwards
Assistant United States Attorneys